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IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF OREGON

PORTLAND DIVISION

UNITED STATES OF AMERICA,

PLAINTIFF,

VS.

TONY DANIEL KLEIN,

DEFENDANT.

No. 3:22-cr-00084-SI

**DEFENDANT'S
SUPPLEMENTAL EXPERT
SUMMARY AND NOTICE**

COMES NOW, the defendant, Tony Klein, by and through counsel, and supplements his previous notice pursuant to Fed. R. Crim P. 16(b)(1)(C) of his intent to introduce testimony under Fed. R. Evid. 702, 703, or 705 in the trial on the matter.

DEFENSE'S EXPERT WITNESS

I. Constantine Alleyne, Founder and President of Civilian Corrections Academy

a. List of cases in which Ms. Alleyne has testified in the past four years

Like the Government's proffered expert, Ms. Alleyne has not testified in the past four years.

b. Bases for the Summaries, Opinions, and Conclusions to be Offered

The bases for the summaries, opinions, and conclusions to be offered is two decades worth of experience Ms. Alleyne has working in the correctional setting, and specifically, the experience she has working in health services management in a correctional setting. She will rely on her experience from prior instances of sexual abuse and assault in jails and prisons, of prior experiences of inmate exploitation of civilian staff members in prison, trainings she has received and presented, including, the training she provides as the founder of the Civilian Corrections academy, where she trains civilians on working in a correctional setting, as well as her time on the PREA committee.¹

The defense understands the government has an ongoing request for materials relied upon by Ms. Alleyne. If Ms. Alleyne reviews any materials or documents in forming her opinions, defense will provide those to the government and expects the government to do

¹ Decades of experience in a unique field is precisely the type of expertise the Government regularly relies upon when proffering experts of their own, and recently so. See, e.g., *United States v. Dontae Hunt*, 3:18-cr-00475-IM, ECF 82, pages 9-13 (proffering a DEA Agent as an expert on drug trafficking based on his experience interviewing drug dealers and working on investigations involving drugs).

the same with their proffered witness. The defense has no such documents to provide at this time.

Respectfully submitted on March 30, 2023

/s/ Amanda Thibeault

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Attorney for Defendant